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35 N. E. 1131; *Patten v. Bartlett*, *supra*. No technical rule can be laid down for determining the status of a visitor; and the circumstances of each case must be regarded. The slightest connection between the motive of the visit and the owner's business suffices. Thus a visitor accompanying a prospective passenger to a railroad station, or one there to meet a passenger, is an invitee. *Hamilton v. Texas and P. R. Co.*, 64 Tex. 251, 53 Am. Rep. 756; *McKone v. Mich. Cent. R. Co.*, 51 Mich. 601, 17 N. W. 74, 47 Am. Rep. 596. Or one present to aid another, having business with the owner, to acquire information concerning the transaction. *St. Louis I. M. and S. Ry. v. Fairbairn*, 48 Ark. 491, 4 S. W. 50. Or one carrying meals or water to employees on the premises, with the owner's permission. *Illinois Cent. R. Co. v. Hopkins*, 200 Ill. 122, 65 N. E. 656; *Purtell v. Philadelphia and R. Coal and Iron Co.*, 256 Ill. 110, 99 N. E. 899. But no invitation can be implied where the visitor is on the premises for his own convenience, curiosity or pleasure. *Manning v. Chesapeake and O. R. Co.*, 36 W. Va. 329, 15 S. E. 81, 16 L. R. A. 271, 32 Am. St. Rep. 859; *Burbank v. Illinois Cent. R. Co.*, 42 La. Ann. 1156, 8 South. 580, 11 L. R. A. 720; *Dixon v. Swift*, 98 Me. 207, 56 Atl. 761. Or even where he is transacting business which is wholly unconnected with that of the owner. *Norris v. Hugh Nawn Contracting Co.*, 206 Mass. 58, 91 N. E. 886, 31 L. R. A. (N. S.) 623, 19 Ann. Cas. 424; *Indian Refining Co. v. Mobley*, 134 Ky. 822, 121 S. W. 657, 24 L. R. A. (N. S.) 497; *Plummer v. Dill*, 156 Mass. 426, 31 N. E. 128, 32 Am. St. Rep. 463. There seems, however, to be a tendency, followed by the principal case, to extend the doctrine of implied invitation in order to include those entering the property of a corporation on any business, whether related to that of the owner or not. See *Klugherz v. Chicago M. & St. P. R. Co.*, 90 Minn. 17, 95 N. W. 586, 101 Am. St. Rep. 384.

PARDON—ABSENCE OF THE GOVERNOR FROM STATE—VALIDITY OF PARDON BY LIEUTENANT GOVERNOR.—A state constitution provided that in case the governor removed from the state, or because of other disabilities became unable to discharge the duties of the office, the said office should devolve upon the lieutenant governor until such disability should be removed. While the governor was absent from the state the lieutenant governor issued a parole to one convicted of a crime. *Held*, the parole was valid. *Ex parte Cullens* (Okla.), 150 Pac. 90. See NOTES, p. 67.

REAL PROPERTY—LEASE—INJUNCTION.—A tenant under a lease to begin at a future date seeks to enjoin the landlord and the present tenant from removing buildings from the property leased. *Held*, an injunction will be granted. *Evans v. Prince's Bay Oyster Co.*, 154 N. Y. Supp. 279.

Authority on the point involved in this case is scarce, and the general principles of the common law must be looked to for guidance. By the original feudal law no estate less than freehold was recognized as an interest in lands. If one held an estate for years, he held no interest in the land itself, but merely a right by way of contract, so that at any moment the contract might be broken by the lessor's eviction of the tenant, who would have no recourse except an action for damages for breach of the contract. Hence, estates for years were